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6 IN THE UNITED STATES DISTRICT COURT  
7 FOR THE WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

9 DARIEL DE LOS SANTOS,

10 Plaintiff,

11 vs.

12 KING COUNTY,

13 Defendant.

14 **NO.**

15 **COMPLAINT FOR**  
16 **DECLARATORY**  
17 **AND INJUNCTIVE RELIEF AND**  
18 **DAMAGES**

19 COMES NOW, Plaintiff, Darriel De Los Santos, by and through his attorneys, Conrad A.  
20 Reynoldson and Michael Terasaki of Washington Civil & Disability Advocate, for his Complaint  
21 for Declaratory and Injunctive Relief and Damages to state and allege as follows:  
22

23 **I. INTRODUCTION**

1. The Americans with Disabilities Act and the Washington Law Against  
Discrimination require public entities to provide equal access to programs and services.

2. A county is a public entity within the meaning of Title II of the ADA, 42 U.S.C.  
§ 12131(1), and its implementing regulations, 28 C.F.R. §35.101 *et seq.*



1           10.     This court has jurisdiction pursuant to 28 U.S.C. § 1367, which gives district  
2 courts supplemental jurisdiction over state law claims.

3           11.     Venue is appropriate in this judicial district under 28 U.S.C. § 1391 because the  
4 practices and procedures that give rise to the Plaintiff's Complaint for Declaratory and Injunctive  
5 Relief and Damages occur in this district.

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7                                   **IV.     FACTUAL ALLEGATIONS**

8           12.     The ADA was enacted in 1990, "[t]o establish a clear and comprehensive  
9 prohibition of discrimination on the basis of disability."

10          13.     Based solely on his disability, Plaintiff is not permitted to as fully participate as  
11 other participants in the WER Program who have received the same or lesser sentences.

12          14.     Based solely on his disability, Plaintiff is receiving harsher punishment than other  
13 participants who have received the same or lesser sentences.

14          15.     The ADA prohibits public entities from providing separate or unequal benefits  
15 and services to individuals with disabilities.

16          16.     The WER Program run and managed by King County is a service, program, or  
17 activity of King County.

18          17.     Title II of the Americans with Disabilities Act ("ADA") prohibits a public entity  
19 from discriminating against a qualified individual with a disability on the basis of disability (42  
20 U.S.C. § 12132) and the ADA unambiguously extends to jail and detention contexts.  
21 *Pennsylvania Dep't of Corr. v. Yeskey*, 524 U.S. 206, 213 (1998), *Lee v. City of Los Angeles*, 250  
22 F.3d 668, 691 (9th Cir.2001), *Pierce v. Cty. of Orange*, 526 F.3d 1190, 1214 (9th Cir. 2008) ("It  
23 is undisputed that Title II applies to... services, programs, and activities for detainees.").

1           18.     Public entities like King County violate Title II of the ADA when a “qualified  
2 individual with a disability” is excluded from participation in or denied the benefits of a county’s  
3 services, programs, or activities by reason of the individual’s disability. *Duvall v. Cty. of Kitsap*,  
4 260 F.3d 1124, 1135 (9th Cir. 2001), as amended on denial of reh'g (Oct. 11, 2001); *Kral v. King*  
5 *Cty.*, No. C10-1360-MAT, 2012 WL 726901, at \*9 (W.D. Wash. Mar. 6, 2012).

6           19.     Plaintiff is limited in the major life activity of walking because he is unable to  
7 move his legs.

8           20.     Plaintiff is thus undoubtedly a qualified individual with a disability under the  
9 ADA and WLAD, and King County may not exclude him from full participation in the WER  
10 Program. 28 C.F.R. § 35.130.

11           21.     Because Plaintiff requires the use of a wheelchair, King County initially refused  
12 to accommodate him in the WER Program altogether, detaining him continuously in jail for  
13 seven weeks and providing as explanation only the vague assertion that Plaintiff’s “medical  
14 necessity exceeds limits.”

15           22.     Only after Plaintiff’s attorneys threatened to file immediate legal action did King  
16 County begrudgingly provided Plaintiff with the unequal substitute option of checking in and out  
17 of the King County Adult Detention Center every day.

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19           **King County’s Unequal Treatment of Plaintiff from November 2nd to December 21st**

20           23.     Plaintiff was sentenced to 12 months work release on November 2, 2018 and  
21 anticipated immediate transfer from the King County Adult Detention Center to the facilities of  
22 the WER Program as typically occurs with every other new WER Program participant previously  
23 housed at the jail.

1           24.     The WER Program facility is located on the 10<sup>th</sup> floor of the Superior Court  
2 building and houses participants when not on release for work or education.

3           25.     Upon sentencing, Plaintiff was provided with and promptly signed the  
4 “Conditions of Conduct for Persons SENTENCED by King County Superior Court into Work  
5 Education Release (WER)” and the “WER Participant Information Guidebook,” informing  
6 Plaintiff he would be provided with access to work and school passes, access to clothing, storage,  
7 toiletries, and other items.

8           26.     Plaintiff was already employed and planned to return to work as soon as possible  
9 and his employer was happy to have him return. Plaintiff was also enrolling in technical school  
10 for auto repair.

11          27.     However, WER Program officials soon informed Plaintiff that his “medical  
12 necessity exceeds limits,” without further explanation, and King County continued to confine  
13 Plaintiff in the detention center without release for work or education.

14          28.     King County made no accommodations whatsoever for seven weeks.

15          29.     During this time, the county refused to release Plaintiff for work or school and  
16 simply kept him confined to the jail.

17          30.     Plaintiff missed seven weeks of work while confined to the detention center  
18 without release.

19          31.     Plaintiff’s attorneys initially raised the issue with the jail and the WER Program,  
20 but no accommodations were made.

21          32.     Plaintiff was then forced to engage a second law firm specializing in disability  
22 rights discrimination, who similarly requested the WER Program make accommodations, but  
23 these initial requests were summarily ignored.

**King County's Unequal Treatment of Plaintiff from December 21st to Present**

33. It was only when Plaintiff's attorneys threatened the King County Executive Board with legal action that Plaintiff was permitted to begin checking in and out of the detention center every day for work and school.

34. Since December 21, 2018 Plaintiff has been granted releases during the day for work and school, however, he remains housed at the King County Adult Detention Center and has not been transferred to the WER Program facilities as is typical for ambulatory participants.

35. While Plaintiff's ability to attend work and school is welcomed, King County continues to deny Plaintiff the full participation in and benefits of the WER Program, subjecting Plaintiff to unequal and significantly worse and harsher punishment than other WER Program participants.

36. Plaintiff must still spend his nights and weekends in a considerably more security intensive and restrictive jail environment than the WER Program facility.

37. Additional hardships Plaintiff has endured, that other WER Program participants are not subjected to, include: a lack of available clothing and access to laundry, an inability to obtain basic shaving materials, a prohibition of some school study materials in the detention center, scheduling and corrections officer mistakes and miscommunications resulting in Plaintiff arriving late for work and school and missing showers and meals.

38. While, thankfully, the King County has slowly permitted some of these benefits, these problems would never have occurred if the county had simply accommodated Plaintiff in the WER Program facilities as is required under the ADA.

39. The most glaring difference is that Plaintiff is subjected to increased scrutiny and security checks every time he leaves or enters the detention center.

1           40. Jail personnel have expressed annoyance at the additional work this arrangement  
2 requires.

3           41. The unavoidable consequence of the Defendant's decision to check Plaintiff in  
4 and out of jail, instead of simply solving the WER Program accessibility issues, is that Plaintiff is  
5 subjected to unequal treatment and harsher punishment than normal WER Program participants.

6           42. Defendant's unequal treatment of Plaintiff violates the ADA, the WLAD, and  
7 Section 504 of the Rehabilitation Act of 1973.

8           43. As of the filing of this Complaint, Defendant has failed to provide sufficient  
9 accommodations, make necessary changes in policy, or renovate the WER Program facility to  
10 provide a substantially equal experience in the WER Program for wheelchair using participants.

11  
12                               **V. FIRST CAUSE OF ACTION**

13                               Title II of the Americans with Disabilities Act of 1990  
14                               42 U.S.C. § 12101 *et seq.*

15           44. Plaintiff incorporates by reference the foregoing paragraphs.

16           45. Defendant King County has not made the WER Program facility compliant as  
17 required by the ADA as the facility does not comply with the ADA's accessibility laws and  
18 regulations under the 1991 ADA Standards for Accessible Design (1991 Standards), the 2010  
19 ADA Standards for Accessible Design (2010 Standards), or the Uniform Federal Accessibility  
20 Standards (UFAS).

21           46. Title II of the ADA provides in pertinent part: "[N]o qualified individual with a  
22 disability shall, by reason of such disability, be excluded from participation in or be denied the  
23 benefits of the services, programs, or activities of a public entity, or be subjected to  
discrimination by any such entity." 42 U.S.C. § 12132.

1           47.     At all times relevant to this action, Defendant King County was and is a “public  
2 entity” within the meaning of Title II of the ADA.

3           48.     Defendant not only runs and manages the King County Adult Detention, but also  
4 runs and manages the WER Program.

5           49.     At all times relevant to this action, Plaintiff was and is a qualified individual with  
6 a disability within the meaning of Title II of the ADA and meets the essential eligibility  
7 requirements for the receipt of the services, programs, or activities of the WER Program. 42  
8 U.S.C. § 12131.

9           50.     Defendant is mandated to operate each service, program, or activity, including the  
10 WER Program, “so that, when viewed in its entirety, it is readily accessible to and useable by  
11 individuals with disabilities.” 28 C.F.R. § 35.150; *see also* 28 C.F.R. § 35.149. This requirement  
12 applies to all programs, services, and activities that a public entity offers, whether or not they are  
13 carried out in facilities that have been constructed or altered since January 26, 1992.

14           51.     The regulations implementing Title II of the ADA provide that a public entity  
15 must maintain the features of all facilities required to be accessible by the ADA. 28 C.F.R. §  
16 35.133.

17           52.     On information and belief, Defendant has constructed, altered, or repaired parts of  
18 the WER Program facilities within the meaning of the ADA Accessibility Guidelines  
19 (“ADAAG”) and the UFAS since January 26, 1992, and Defendant has failed to make the WER  
20 Program facilities readily accessible to and usable by persons with disabilities as required under  
21 federal accessibility standards and guidelines.

22           53.     On information and belief, since March 15, 2012, Defendant has constructed,  
23 altered, or repaired parts of the WER Program facilities within the meaning of the ADAAG and



1 the UFAS, and Defendant has failed to make such facilities compliant with the ADAAG and the  
2 UFAS as updated in 2010, as required under 28 C.F.R. § 35.151(c)(5).

3 54. Defendant's failure to make the the WER Program housing area comply with the  
4 ADA's accessibility requirements excludes people with disabilities from equal program access  
5 and participation in the program.

6 55. As a direct and proximate result of the aforementioned acts, Plaintiff has suffered  
7 and continues to suffer difficulty, hardship, isolation, and segregation due to Defendant's failure  
8 to remediate the WER Program facilities. These failures have denied and continue to deny  
9 Plaintiff the full, equal, and meaningful access to the WER Program required by the ADA.

10 56. Because Defendant's discriminatory conduct presents a real and immediate threat  
11 of current and continuing future violations, declaratory and injunctive relief are appropriate  
12 remedies. Congress has authorized courts to issue "order[s] to alter facilities to make such  
13 facilities readily accessible to and usable by individuals with disabilities." 42 U.S.C. §  
14 12188(a)(2).

15 57. Further, Plaintiff is entitled to compensatory monetary damages under Title II of  
16 the ADA if Plaintiff can prove intentional discrimination. Upon information and belief,  
17 Defendant has been aware of the ADA violations for months, if not years, and has failed to  
18 remedy these violations.

19 58. Plaintiff was detained with his wheelchair in the King County Adult Detention  
20 Center prior to issuance of his sentence and thus King County's actual knowledge of Plaintiff's  
21 wheelchair needs predates Plaintiff's eligibility for the WER Program.

22 59. Pursuant to 42 U.S.C. § 12133 and 12205, Plaintiff is entitled to declaratory and  
23 injunctive relief as well as reasonable attorneys' fees, expert expenses, and costs incurred in

1 bringing this action.

2 WHEREFORE, Plaintiff prays for relief as set forth below.

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4 **VI. SECOND CAUSE OF ACTION**

5 Title II of the Americans with Disabilities Act  
6 42 U.S.C. § 12132 – Reasonable Modifications

6 60. Plaintiff incorporates by reference the foregoing paragraphs.

7 61. Defendant discriminates against Plaintiff on the basis of disability in the full and  
8 equal participation of the benefits of the services, programs, and activities of the WER Program  
9 in violation of Title II of the ADA, 42 USC § 12132, and its implementing regulations at 28  
10 C.F.R. Part 35.

11 62. “A public entity shall make reasonable modifications in policies, practices, or  
12 procedures when the modifications are necessary to avoid discrimination on the basis of  
13 disability...” 28 C.F.R. § 35.130(b)(7).

14 63. While Defendant has made modifications in some policies and procedures, like  
15 permitting Plaintiff to check in and out of the detention center for work and education releases,  
16 Defendant’s modifications are not sufficient to avoid discrimination based on Plaintiff’s  
17 disability.

18 64. For example, Plaintiff must travel several blocks to and from the doors of the  
19 detention center to his parked car every day before and after release, a significant distance for a  
20 wheelchair at the steep incline of the downtown Seattle hills.

21 65. While other WER Program participants may make a similar trip, Plaintiff’s  
22 journey in a wheelchair is slower, more dangerous, and more labor intensive, forcing him to  
23 make several stops along the way to catch his breath.

66. Defendant's violations of Title II include, but are not limited to, failing to make sufficient reasonable modifications in policies, practices, or procedures, when such modifications are necessary to afford goods, services, facilities, privileges, advantages, or accommodations to individuals with disabilities, as required in 42 U.S.C. § 12132, and its implementing regulation at 28 C.F.R. § 35.130.

WHEREFORE, Plaintiff prays for relief as set forth below.

**VII. THIRD CAUSE OF ACTION**  
Title II of the Americans with Disabilities Act  
42 U.S.C. §§12132– Equal Opportunity

67. Plaintiff incorporates by reference the foregoing paragraphs.

68. A public entity may not afford a qualified individual with a disability an opportunity to participate in or benefit from the aid, benefit, or service that is not equal to that afforded others. 28 C.F.R. § 35.130(b)(1)(ii)

69. Due to Defendant's refusal to accommodate Plaintiff in the WER Program facilities, Plaintiff cannot sufficiently participate the services, facilities, privileges, advantages, or accommodations of the WER Program on an equal basis with other WER Program participants, and thus Plaintiff endures additional hardships other WER Program participants do not.

70. Hardships Plaintiff endures include segregation from the other WER participants, confinement to the more restrictive and crowded jail during nights and weekends, increased difficulty and danger during travel to and from his car each day, decreased access to school study materials, and a greater deprivation of freedoms than others with identical sentences.

71. Thus, Defendant violates 42 USC § 12132, and its implementing regulation at 28

1 C.F.R. § 35.130(b)(1)(ii).

2 WHEREFORE, Plaintiff prays for relief as set forth below.

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4 **VIII. FOURTH CAUSE OF ACTION**

5 Title II of the Americans with Disabilities Act  
6 42 U.S.C. §§12132 – Methods of Administration

7 72. Plaintiff incorporates by reference the foregoing paragraphs.

8 73. Public entities may not utilize criteria or methods of administration that have the  
9 effect of subjecting qualified individuals with disabilities to discrimination on the basis of  
10 disability. 28 C.F.R. § 35.130(b)(3).

11 74. Due to Plaintiff's need for a wheelchair, King County has been unwilling to allow  
12 him to participate in the WER Program as other participants do.

13 75. King County has added the additional participation standard or criteria of "being  
14 able to walk" to WER Program qualification requirements which participants must meet before  
15 participants may access the full benefits of the WER Program.

16 76. Defendant discriminates against Plaintiff in utilizing standards, criteria, or  
17 methods of administration that have the effect of subjecting qualified individuals with disabilities  
18 to discrimination on the basis of disability, in violation of Title II of the ADA, 42 USC § 12132,  
19 and its implementing regulation at 28 C.F.R. § 35.130(b)(3).

20 WHEREFORE, Plaintiff prays for relief as set forth below.

21 **IX. FIFTH CAUSE OF ACTION**

22 Title II of the Americans with Disabilities Act  
23 42 U.S.C. § 12134 – Inappropriate Security Classification

77. Plaintiff incorporates by reference the foregoing paragraphs.

1           78. Public entities shall ensure that qualified inmates or detainees with disabilities  
2 shall not, because a facility is inaccessible to or unusable by individuals with disabilities, be  
3 excluded from participation in, or be denied the benefits of, the services, programs, or activities  
4 of a public entity, or be subjected to discrimination by any public entity. 28 C.F.R. § 35.152(a).

5           79. The ADA implementing regulations regarding “jails, detention and correctional  
6 facilities, and community correctional facilities” are contained in 28 C.F.R. § 35.152.

7           80. A public entity may not, based on disability, exclude an inmate in a jail, detention,  
8 or correctional setting from participation in or deny to him the benefits of the public entity’s  
9 services, programs, or activities. 28 C.F.R. §35.152(b)(1).

10           81. Furthermore, a public entity “shall not place inmates or detainees in inappropriate  
11 security classification because no accessible beds or cells are available.”

12           82. The WER Program facility is a substantially less restrictive housing facility than  
13 the King County Adult Detention Center.

14           83. Plaintiff continues to be housed in the King County Adult Detention Center, not  
15 in the WER Program facility.

16           84. The security measures utilized for ingress and egress at the King County Adult  
17 Detention Center are significantly more stringent than those at the WER Program facilities,  
18 including, but not limited to, extensive use of X-ray and metal detector screenings, pat downs,  
19 additional supervision when changing from jail attire to work and school attire, and correctional  
20 officer escort between detention cell and street.

21           85. The general security measures in place within the King County Adult Detention  
22 Center are also significantly more stringent than those at the WER Program facilities, including a  
23 prohibition on many items permitted at the WER Program facility for work and school use like

1 study supplies and personal effects.

2 86. The level of security required for King County Adult Detention Center's mission  
3 and purpose mandates most or all of the security measures currently implemented at the King  
4 County Adult Detention Center.

5 87. In contrast, the level of security required for the WER Program's mission and  
6 purpose does not mandate the same security measures implemented at the King County Adult  
7 Detention Center to be implemented at the WER Program facility, and lesser security measures  
8 are in use at the WER Program facility.

9 88. Thus, King County violates the ADA by requiring Plaintiff to be housed in an  
10 inappropriate and higher level of security than that of the WER Program facilities.

11 WHEREFORE, Plaintiff prays for relief as set forth below.

12  
13 **X. SIXTH CAUSE OF ACTION**  
14 Section 504 of the Rehabilitation Act of 1973  
29 U.S.C. § 794 *et seq.*

15 89. Plaintiff incorporates by reference the foregoing paragraphs.

16 90. Section 504 of the Rehabilitation Act of 1973 (the "Rehabilitation Act") provides  
17 in pertinent part: "[N]o otherwise qualified individual with a disability ... shall, solely by reason  
18 of her or his disability, be excluded from the participation in, be denied the benefits of, or be  
19 subjected to discrimination under any program or activity receiving federal financial assistance  
20 ...." 29 U.S.C. § 794(a).

21 91. Plaintiff is otherwise qualified to participate in the services, programs, or  
22 activities provided by and at the WER Program.

23 92. Defendant King County is a direct recipient of federal financial assistance

1 sufficient to invoke the coverage of Section 504 of the Rehabilitation Act and has received such  
2 federal financial assistance at all times relevant to the claims asserted in this Complaint.

3 93. Plaintiff, solely by reason of his disability, has been and continues to be excluded  
4 from full participation in the WER Program, denied the full benefits of the WER Program, and  
5 subjected to discrimination under Defendant's provision of benefits and services offered at the  
6 WER Program.

7 94. As a direct and proximate result of the aforementioned acts, Plaintiff suffered and  
8 continues to suffer difficulty, hardship, isolation, and segregation due to Defendant's failure to  
9 remediate wheelchair accessibility barriers at the WER Program facilities. These failures have  
10 denied Plaintiff the full, equal, and meaningful access to the WER Program that Section 504  
11 requires.

12 95. Because Defendant's discriminatory conduct presents a real and immediate threat  
13 of current and continuing violations, declaratory and injunctive relief are appropriate remedies.

14 96. Further, Plaintiff is entitled to compensatory monetary damages under Section  
15 504 of the Rehabilitation Act in situations of "deliberate indifference" by the Defendant. *Duvall*  
16 *v. County of Kitsap*, 260 F.3d 1124, 1138 (9th Cir. 2001); *Lovell v. Chandler*, 303 F.3d 1039,  
17 1056 (9th Cir. 2002).

18 97. Upon information and belief, Defendant has been aware of the WER Program's  
19 accessibility issues for months, if not years, and has failed to abate the problems.

20 98. Pursuant to 29 U.S.C. § 794a, Plaintiff is entitled to declaratory and injunctive  
21 relief and to recover from Defendant the reasonable attorneys' fees and costs incurred in bringing  
22 this action.

23 WHEREFORE, Plaintiff prays for relief as set forth below.

**XI. SEVENTH CAUSE OF ACTION**

Washington Law Against Discrimination  
Revised Code of Washington §§49.60 et seq.

99. Plaintiff incorporates by reference the foregoing paragraphs.

100. Section 49.60.030(1) of the Revised Code of Washington provides “the right to be free from discrimination because of . . . the presence of any sensory, mental, or physical disability . . . is recognized as and declared to be a civil right.”

101. Plaintiff is an individual with a disability within the scope of the Washington Law Against Discrimination.

102. Plaintiff is informed, believes, and thereon alleges that Defendant and its agents and employees have violated and continue to violate §§ 49.60.010 *et seq.* of the Revised Code of Washington by unlawfully denying Plaintiff full and equal access to the WER Program comparable to the access offered to WER Program participants who do not use wheelchairs.

103. Defendant’s actions constitute discrimination against persons with disabilities and violate the Washington Law Against Discrimination (Revised Code of Washington § 49.60.010 *et seq.*) in that persons with mobility disabilities have been and are denied full and equal enjoyment of the advantages, facilities, privileges, and services that Defendant provides to individuals who do not have disabilities.

104. As a direct and proximate result of the aforementioned acts, Plaintiff has suffered and continues to suffer difficulty, hardship, isolation, and segregation due to Defendant’s failure to remediate the WER Program facility.

105. Because Plaintiff has a clear legal right to be free from discrimination, has a well-grounded fear of immediate invasion of that right as the invasion is ongoing, and has been and continues to be actually injured as a result of Defendant’s conduct as alleged herein, declaratory



1 and injunctive relief are appropriate remedies. *See Kucera v. Dep't of Transp.*, 140 Wash. 2d  
2 200, 209 (2000).

3 106. Pursuant to Wash. Rev. Code § 49.60.030(2), Plaintiff is entitled to declaratory  
4 and injunctive relief and to recover from Defendant the reasonable attorneys' fees and costs  
5 incurred in bringing this action.

6  
7 **XIII. PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiff respectfully requests that this Court:

- 9 1. Declare Defendant's conduct as alleged herein has violated and continues to  
10 violate Title II of the Americans with Disabilities Act, Section 504 of the  
11 Rehabilitation Act of 1973, the Washington Law Against Discrimination, and the  
12 regulations promulgated under those statutes;
- 13 2. Permanently enjoin Defendant to remedy the effects of Defendant's past and  
14 ongoing violations of Title II of the Americans with Disabilities Act, Section 504  
15 of the Rehabilitation Act of 1973, and the Washington Law Against  
16 Discrimination, and the regulations promulgated under those statutes, by ensuring  
17 equal access to the Work and Education Release Program for qualified  
18 individuals;
- 19 3. Enter judgment in favor of Plaintiff;
- 20 4. Award Plaintiff compensatory damages as proper for intentional discrimination  
21 under Title II of the Americans with Disabilities Act;
- 22 5. Award Plaintiff reasonable attorneys' fees and costs, as provided by law; and
- 23 6. Award such additional or alternative relief as may be just, proper and equitable.

1  
2 DATED THIS 6th day of March, 2019

3  
4 WASHINGTON CIVIL & DISABILITY ADVOCATE  
*Attorneys for Plaintiff*

5 /S/ CONRAD REYNOLDSON

6 Conrad Reynoldson  
7 WSBA# 48187  
8 3513 NE 45th Street, Suite G  
Seattle, WA 98105  
(206) 876-8515  
conrad@wacda.com

9 /S/ MICHAEL TERASAKI

10 Michael Terasaki  
11 WSBA# 51923  
12 3513 NE 45th Street, Suite G  
Seattle, WA 98105  
(206) 971-1124  
terasaki@wacda.com